

In the Matter of

WC Docket No.

ADDENDUM

Before the
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of

Application by Qwest Communications
International Inc. for Provision of
In-Region, InterLATA Services
In Colorado, Idaho, Iowa, Montana,
Nebraska, North Dakota, Utah,
Washington and Wyoming

WC Docket No. _____

**APPLICATION BY
QWEST COMMUNICATIONS INTERNATIONAL INC.
FOR PROVISION OF IN-REGION,
INTERLATA SERVICES IN
COLORADO, IDAHO, IOWA, MONTANA, NEBRASKA,
NORTH DAKOTA, UTAH, WASHINGTON AND WYOMING**

ADDENDUM TABLE OF CONTENTS

Tab	Description
1	Service Order Accuracy
2	Status of "Conversion as Specified" and "Migration by TN" Change Requests
3	Reporting Service Affecting Troubles
4	Status of Timely Jeopardy Notice Performance (PO-9)
5	Bill Auditability, BOS Status, Dispute Resolution Timeliness, and Accuracy/Completeness
6	Status of DSL Disconnects on UNE-P Orders
7	Status of Line Sharing Service Order Completions
8	Status of Treatment of Line Sharing Outages
9	Status of Router Testing for Line Sharing
10	Response to Price Squeeze Questions (Montana) and Status of UNE Rates (Washington)
11	Application of the Switching Carve-Out
12	Status of Qwest's Policies Regarding UNE Combinations
13	State-by-State Filing Status of Unfiled Agreements
14	Conversions Through Change Orders
15	Breakout of UNE-P Star Performance Data

Service Order Accuracy

A. Manual Service Order Accuracy

To ensure that CLEC customers and end users receive the best possible local service, Qwest has in the past addressed – and today continues to address – concerns raised in connection with its manual processing of LSRs. The majority of LSRs submitted by CLECs are designed to flow-through to Qwest's Service Order Processor with minimal human intervention. However, under certain circumstances, LSRs drop out of the order flow and require manual handling.¹ When this occurs, trained Qwest Service Delivery Coordinators ("SDCs") process those LSRs so that the requested services are provisioned to CLEC customers and end users on an accurate and timely basis.

Among the measures Qwest has adopted to ensure manual service order accuracy is the proposal (and interim adoption) of PID PO-20.² PO-20 evaluates the degree to which Qwest accurately processes LSRs that are electronically submitted but fall out for manual processing by measuring the percentage of Qwest service orders that are populated correctly, in

¹ LSRs typically drop out for manual processing if, among other things, they are not flow-through-eligible or they contain an error.

² See "Summary of Notes on Qwest Regional Performance Results Report, September 2001 – August 2002," September 24, 2002, at Attachment 2, available at www.qwest.com/wholesale/downloads/2002/020925/RG-Sep01-Aug02NotesSummary.pdf. See also Qwest II Declaration of Michael G. Williams, Commercial Performance, at ¶ 337, Exhibit MGW-Perf-2. For ease of reference, a current copy of PO-20 is attached hereto as Exhibit 1-1.

specified data fields, within information obtained from CLEC LSRs.³ A complete description, as well as a copy, of PO-20 was included in the record in the Qwest I and Qwest II proceedings.⁴

As the chart below demonstrates, during the three months in which PO-20 has been in existence, Qwest accurately processed over 90% of Resale and UNE-P POTS LSRs and over 95% of Unbundled Loop LSRs that have fallen out for manual processing.

<u>Commercial Performance Results Under PO-20</u>		
MONTH	RESALE/UNE-P	UNBUNDLED LOOPS
June	90.25%	96.46%
July	90.58%	95.20%
August	92.78%	95.16%

Qwest's performance under PO-20 is measured on a region-wide basis. Qwest provided extensive information in connection with its manual order processing, and, more specifically, on PO-20, in the Qwest I and Qwest II proceedings.⁵

³ See *id.*

⁴ See *id.*; see also Qwest 08/20/02m Ex Parte (Response to FCC Confirming Submission of PID PO-20 to States for Inclusion in PAP).

⁵ See Qwest 09/10/02a Ex Parte (Response to Wireline Competition Bureau on Revisions to LSR Volumes under PO-20 for ROC I); Qwest 09/10/02b Ex Parte (Response to Wireline Competition Bureau on Revisions to LSR Volumes under PO-20 for ROC II); Qwest 09/03/02d Ex Parte (Response to Wireline Competition Bureau on LSR Volumes Under PO-20 for April-June For Resale, UNE-P, and UBL for ROC I); Qwest 09/03/02e Ex Parte (Response to Wireline Competition Bureau on LSR Volumes Under PO-20 for April-June For Resale, UNE-P, and UBL for ROC II); Qwest 08/27/02c Ex Parte (Response to Wireline Competition Bureau on Draft Description of Order Accuracy Performance Measure); Qwest 08/23/02c Ex Parte (Response

In response to CLEC input on PO-20 (and pursuant to the standard practice being adopted for new PIDs and PID modifications), Qwest has requested that PO-20 be addressed in the Long-term PID Administration ("LTPA") process. The first LTPA meeting has tentatively been scheduled for October 3, 2002. While PO-20 is under discussion, Qwest will continue to report its manual service order accuracy performance under PO-20's current definition.

On August 19, 2002, Qwest requested that each of the nine Application states include PO-20 in its state Performance Assurance Plan ("PAP"). Each of these states is in various stages of developing a record with respect to Qwest's request, and Qwest expects that these states will take into account the LTPA's review of PO-20 in their processes. ⁶

to DOJ on PO-20); Qwest 08/20/02m Ex Parte (Response to FCC Confirming Submission of PID PO-20 to States for Inclusion in PAP); Qwest 08/19/02b Ex Parte (Response to Wireline Competition Bureau on PO-20 Performance Measure Fields, DSL Resale Discount and Performance Results for EEL); Qwest 08/09/02b Ex Parte (Response to FCC on Manual Service Order Accuracy).

⁶ See Exhibit 1-2 (PO-20 Filing Status Chart). As of the date of this filing, only Colorado and Washington have acted on Qwest's submission. The Colorado PUC declined to incorporate PO-20 into the Colorado PAP at this time, and instead deferred consideration of its adoption until such time as the LTPA has processed PO-20. *In the Matter of Qwest's Corporation's Performance Assurance Plan*, Docket No. 02M-259T, *Order Denying Motion*, adopted September 18, 2002, at 4. The Washington UTC, however, agreed to incorporate PO-20 into the Washington PAP, though the PID will be subject to further review in the LTPA process. *In the Matter of the Investigation into U S WEST Communications, Inc.'s Compliance with Section 271 of the Telecommunications Act of 1996, et. al*, Docket No. UT-003022, *43rd Supplemental Order; Approving Qwest's Request for Acceptance of Performance Measure PO-20, With Conditions*, September 26, 2002, at 4.

LSRs submitted by carriers and resulting service orders contain a variety of fields. PO-20 was designed to compare those fields to determine whether the fields on the LSRs and service orders match. Admittedly, PO-20 is not designed to compare all of the fields that exist. For example, PO-20 does not compare the Services & Equipment (“S&E”) section of the service order to the LSR. This is because PO-20 was designed to evaluate perceived idiosyncrasies in Qwest’s manual processes resulting from KPMG’s analysis in the ROC OSS Test. Because KPMG’s analysis did not identify mismatches in the S&E sections of CLEC LSRs and service orders, Qwest did not focus on including those fields in PO-20. Regardless, to the extent CLECs prefer that fields be added to PO-20, they will have an opportunity to raise their concerns – and have them vetted fully – in the LTPA process.

In its Qwest I and Qwest II filings, Qwest discussed the multiple measures it has put in place to ensure that manually-processed service orders are processed accurately. Qwest has continued to implement system enhancements to further this objective. For example, system edits were implemented on August 17, 2002, as part of the IMA 10.1 release. These edits included a comparison of the Purchase Order Number (“PON”) populated on the service order(s) listed on the FOC to the PON on the LSRs

that the Qwest service order representative processes to ensure mismatches do not occur.⁷

Qwest already filed in Qwest I and Qwest II a description of what its PO-20 performance would have been had these system edits been in place between April through July, 2002.⁸ As explained in that filing, Qwest's performance would have improved anywhere between 0.24% and 5.78% (depending on the product) in each month during that period.⁹ Had the August 17 enhancement been in place for all of August, Qwest's performance under PO-20 that month also would have improved. Specifically, Qwest's performance for Resale and UNE-P POTS would have increased from 92.78% to 93.33%, and its performance for Unbundled Loops would have increased from 95.16% to 96.08%. The August 17 edit also was intended to ensure consistency between the due date on the service order and on the FOC; this aspect of the edit was implemented on August 17, and, because of issues that arose during implementation, will be enhanced so that it applies to additional products and services no later than October 12, 2002.

In an ex parte filing in the Qwest I and Qwest II proceedings, Eschelon claimed that LSRs manually handled by Qwest are subject to error

⁷ The August 17 edit applies only to initial LSRs because the PON must remain the same on any supplemental LSR.

⁸ See Qwest 08/23/02c Ex Parte (Response to DOJ on PO-20).

⁹ See *id.*

rates as high as 40%.¹⁰ Eschelon based this figure on its purported comparison of Pending Service Order Notifications (“PSOs”) to LSRs. On August 17, 2002, Qwest began providing CLECs with PSOs – which follow FOCs – to give CLECs the option, if they so desire, to compare the service order the Qwest SDC has manually submitted on behalf of the CLEC to the LSR initially submitted by that CLEC. Qwest began providing CLECs with this capability in response to a Change Request submitted by Eschelon.¹¹ Eschelon claims to have conducted an analysis of PSOs to LSRs from August 26 through September 3, 2002, to arrive at its 40% figure.¹²

Eschelon’s 40% figure is wildly overstated and lacks any basis in fact. After learning of Eschelon’s claims, Qwest asked to review the relevant data collected by Eschelon and received *a mere seven* occurrences dating from August 26 through September 6, 2002. After conducting its own analysis of the LSRs provided, Qwest discovered that only six of the LSRs contained errors.¹³

¹⁰ See Eschelon Ex Parte in Qwest I and Qwest II, filed September 4, 2002, at 10-11.

¹¹ See Exhibit 1-3 (Eschelon Change Request #25497)

¹² See *id.*

¹³ Qwest’s data show that the company returned 1211 FOCs to Eschelon between August 26 and September 3, 2002. As noted above, only six of the occurrences Eschelon provided to Qwest contained errors. It is unclear to Qwest whether Eschelon considers this to be the full universe of LSRs that were manually processed incorrectly. If it is, the six occurrences Eschelon provided amount to a mere 0.495% (6/1211) of the LSRs it submitted during this period.

To validate its analysis, Qwest separately manually reviewed 2,118 ISC Call Center tickets that were received from Eschelon between August 19 and September 13, 2002. Qwest did this to investigate Eschelon's claim that, when it found a mismatch between the PSON and LSR, it contacted a Qwest Service Center. Qwest's analysis showed that, of the 2,118 tickets received from Eschelon, only 41 contained comments that could reasonably be interpreted as identifying a potential mismatch between the PSON and the LSR. During this same period, Eschelon received FOCs on 3,843 LSRs, as measured by PO-5A and PO-5B. Thus, even during this longer stretch of time, PSON to LSR mismatches occurred only on 1.06% of LSRs. It defies logic for Eschelon to suggest that 40% of its orders during the August 26 through September 3, 2002, time period contained such mismatches.

B. Service Order Accuracy

To demonstrate its commitment to refining its overall service order accuracy – and in response to CLEC concerns regarding the accuracy of Qwest installations – Qwest has begun to report additional service order accuracy results that reflect order accuracy based on the number of customer calls received each month by the Call Centers reporting discrepancies between the LSR submitted and the service provided by Qwest.¹⁴ This

¹⁴ See “Summary of Notes on Qwest Regional Performance Results Report, September 2001 – August 2002,” September 24, 2002, *available at* www.qwest.com/wholesale/downloads/2002/020925/RG-Sep01-

measure, which in the past was sometimes referred to as “OP-5++” but is now called “Service Order Accuracy – via Call Center Data,” is reported on a state-specific aggregate basis for all products listed in the OP-5 PID. The measure is intended to report those discrepancies that are not captured by the PID OP-5, which pertains to installation quality.¹⁵ Results are calculated using the same base of orders as OP-5.¹⁶

Qwest began reporting its performance under the “Service Order Accuracy – via Call Center Data” measure only recently (in July 2002), but its performance in each of the nine Application states has been very strong. For example, in Colorado, Idaho, Iowa, Montana, Nebraska, North Dakota, Utah and Washington, more than 99% of the orders issued were error free in both July and August, 2002.¹⁷ In Wyoming, 96.80% of orders in July and 98.56% of orders in August were error free;¹⁸ but, because the volume of service orders in Wyoming is significantly lower than in, for example,

Aug02NotesSummary.pdf, at Attachment 3. For ease of reference, a current copy of Qwest’s “Service Order Accuracy – via Call Center Data” measure is attached hereto as Exhibit 1-4. *See also* Qwest 08/27/02c Ex Parte (Response to Wireline Competition Bureau on Draft Description of Order Accuracy Performance Measure).

¹⁵ *See id.* at 1.

¹⁶ *See id.* at 43.

¹⁷ *See* Colorado Commercial Performance Results at 77; Idaho Commercial Performance Results at 74; Iowa Commercial Performance Results at 76; Montana Commercial Performance Results at 69; Nebraska Commercial Performance Results at 75; North Dakota Commercial Performance Results at 69; Utah Commercial Performance Results at 76; Washington Commercial Performance Results at 77.

¹⁸ *See* Wyoming Commercial Performance Results at 68.

Colorado, conclusions regarding Qwest's capabilities are more appropriately drawn from its performance in the other Application states.

Qwest's "Service Order Accuracy – via Call Center Data"

measure is in the early stages of development, but Qwest expects it to evolve into an official PID in the near future. To that end, Qwest plans to submit this measure to the LTPA process, which is scheduled to commence in early October, after which it will be subject to comment and further refinement by CLECs, state regulatory agencies, and other participating parties.

A

PO-20 – Manual Service Order Accuracy¹

Purpose: Evaluates the degree to which Qwest accurately processes CLECs' Local Service Requests (LSRs), which are electronically-submitted and manually processed by Qwest, into Qwest Service Orders.	
Description: Measures the percentage of Qwest service orders that are populated correctly, in specified data fields, with information obtained from CLEC LSRs. <ul style="list-style-type: none"> Includes only service orders created from CLEC LSRs that Qwest receives electronically (via IMA-GUI or IMA-EDI) and manually processes in the creation of service orders, regardless of flow through eligibility, subject to exclusions as specified below. Includes only service orders, from the product reporting categories specified below, that request inward line or feature activity (Change, New, and Transfer order types), are assigned a due date by Qwest, and are completed/closed in the reporting period. Change order types included in this measurement consist of all C orders with "I" and "T" action-coded line or feature USOCs. Service orders evaluated in this measurement are either (1) those selected randomly ^{NOTE 1} and manually inspected for accuracy as defined herein, or (2) when Qwest develops mechanized capabilities for this measurement as specified in the Availability section below, all service orders satisfying the above criteria. A service order will be classified as "accurate" and thus counted in the numerator in the formula below when evaluation determines that the fields specified in the Service Order Fields Evaluated section below (per the indicated phases), when populated on the LSR, are all accurate, as applicable, on the service order. Accuracy is defined as the contents of the specified fields, in the service orders involved in provisioning the service, matching the information from the relevant fields as provided in the latest version of associated LSRs. 	
Reporting Period: One month	Unit of Measure: Percent
Reporting Comparisons: CLEC Aggregate	Disaggregation Reporting: Region-wide
Formula: $\frac{[(\text{Number of accurate service orders}) + (\text{Number of evaluated service orders completed in the reporting period})] \times 100}{\text{Number of evaluated service orders}}$	
Exclusions: <ul style="list-style-type: none"> Cancelled service orders. Orders generated from LSRs with non-fatal errors. Orders that cannot be matched to a corresponding LSR. 	
Product Reporting: <ul style="list-style-type: none"> Resale POTS and UNE-P (POTS) Unbundled Loops (Analog and Non-Loaded 2-wire) 	Standard: 95 percent
Availability: Under Development: <ul style="list-style-type: none"> Phase 0 - Manual, random sampling approach: Jun 02 results reported in the Jul 02 report. Phase 1 - Mechanized approach, replacing manual approach: TBD 	Notes: <ol style="list-style-type: none"> Manually-selected orders will consist of 20 random, qualifying orders per day per product reporting category, specified above, from throughout Qwest's 14-state local service region.

¹ The definitional aspects (i.e., the Purpose section through the Notes section) of this version are the same as the 11 Jun 02 version, except that the standard has been changed from "Diagnostic" to "95 percent." The section on Service Order Fields Evaluated for Phase 0, below, has been updated to clarify the fields and how the fields are evaluated.

PO-20 – Manual Service Order Accuracy (continued)

Service Order Fields Evaluated (by Phase of implementation)			
Phase 0 – (01 Jun 02 Forward) Random sampling approach; Manual comparison of the fields from the Service Order to the LSR:			
	Field Code	Field Name	Remarks
	CCNA	CLEC ID	Order entry validated from LSR Form
	D/Tsent	Date sent to help ID App	Order entry validated from LSR Form
	Name	Name of Customer	Order entry validated from End User or Directory Listings Forms, when applicable
	SANO	Service Address Number	Order entry validated from End User or Directory Listings Forms, when applicable
	SASD	Service Address Direction	Order entry validated from End User or Directory Listings Forms, when applicable
	SASN	Service Address Street Name	Order entry validated from End User or Directory Listings Forms, when applicable
	LD1	LOC	Order entry validated from End User or Directory Listings Forms, when applicable
	LV1	LOC #	Order entry validated from End User or Directory Listings Forms, when applicable
	City	City name	Order entry validated from End User or Directory Listings Forms, when applicable
	PON	Purchase Order Number	Order entry validated from LSR Form
	Date/ FOC'd date	Due Date on Order	Order entry validated from LSR FOC sent to the CLEC
Phase 1 – (Dates TBD) First phase of mechanized measurement:			
	Field Code	Field Name	Remarks
	Same as Phase 0	Same as Phase 0	
Future Phase – TBD in Long Term PID Administration; Additional fields included in mechanization, if any:			
	Field Code	Field Name	Remarks
	TBD	TBD	

PO-20 FILING STATUS

State	Qwest Filing Date	Opposition		Qwest Response	Comments Due Date	Status
		Party	Date			
Colorado	8/19/02	AT&T WorldCom	8/30/02			On September 24, 2002, the CPUC issued Decision No. C02-1029 in Docket No. 02M-259T declining to include PO-20 in the CPAP. The CPUC determined that development of the PO-20 PID should be part of the long term PID administration, consistent with its Decision No. C02-718, dated June 26, at page 74, Docket No. 02M-260T, and that the inclusion of PO-20 in the CPAP should be in accordance with the timeframes set out in that decision.
Idaho	8/19/02	AT&T WorldCom	8/30/02	9/13/02		The IPUC Staff is evaluating the filing and is expected to prepare a recommendation for the Commission.
Iowa	8/19/02	AT&T WorldCom	9/3/02	9/12/02		The IUB is expected to issue a decision in the near future.
Montana	8/19/02	AT&T WorldCom	8/30/02	9/18/02	9/18/02	The MPSC has the issue scheduled for a work session on October 1, 2002 and is expected to make a decision at that time.
Nebraska	8/19/02	AT&T WorldCom	8/29/02	9/19/02		No procedural dates or process have been established.
New Mexico	8/20/02 (QPAP)					In the QPAP decision issued on August 13, 2002, the NMPRC directed Qwest "to include PO-20 in its NM QPAP consistent with the commitment Qwest is on record as having made for the states for which it presently has pending section 271 applications." (Page 9, Paragraph 21.) Qwest has submitted its compliance filing.
North Dakota	8/19/02	AT&T	8/29/02	9/19/02	9/19/02	The NDPSC Staff is evaluating the comments and will make a procedural recommendation to the Commission.
Oregon						Oregon's filing is being held by the Staff at Qwest's request to be supplemented with updated long term PID administration information.
Utah	8/19/02	AT&T	9/3/02	9/16/02		No procedural dates or process have been established
Washington	8/19/02	AT&T	8/22/02	9/16/02		On 9/24/02, the WTUC approved Qwest's request to include PO-20 in the QPAP on an interim basis on the condition that Qwest work collaboratively with CLECs and other members of the ROC TAG to refine and modify the measure and that the measure be subject to review and modification at the six-month review.
Wyoming	8/19/02	AT&T WorldCom	8/30/02	9/16		The WPSC will consider the procedure for PO-20 at an open meeting to be held during October 2002.

Open System Change Requests -- Detail

Report Record # 1					
CR #	Title	Status Date	Level of Effort	Interface Release #	Products Impacted
25497	Provide Pending Service Order S&E to CLECs [Include summary USOC(s) in FOC]	Completed 9/19/02	5500 - 8000	IMA Common 10.01	All Products

Originator: Gallegos, John

Originator Company Name: Qwest

Director: Thompson, Jeff

Owner: Winston, Connie

CR PM: Routh, Mark

Description Of Change

Providers are requesting a summary of the order by USOC to be included with the FOC so that errors can be identified and corrected before the order completes.

Status History:

Date	Action	Description
9/26/01	CR Submitted	CR transferred from legacy database to CMP database
9/26/01	Clarification Meeting Held	CR was clarified with John Gallegos
10/18/01	Discussed at Monthly CMP Meeting	Presented at Oct CMP meeting
10/25/01	Status Changed	Prioritization list sent to all CLECs for IMA 10.0 ranking, status changed to prioritization
10/31/01	Release Ranking	Ranking for Release 10.0 occurred at October, 2001 CMP Meeting. 25497 ranked 3
1/03/02	Record Update	Related UR# updated from UR1950 to UR2849
1/17/02	Discussed at Monthly CMP Meeting	CR # 25497 discussed during 10.0 Packaging Presentation; definition work continues on CR; CR is targetted for 10.0 but may become a 10.01 spillover CR
1/17/02	Status Changed	Status updated to 'In Definition' based upon 10.0 Packaging discussion from CMP meeting; this candidate might be part of a 10.01 release; related CRs (5079096, 5466535) were withdrawn with CLEC agreement as duplicates of CR 25497
3/21/02	Discussed at Monthly CMP Meeting	25497 discussed at March Systems CMP Monthly meeting during IMA Release 10.0 Commitment Discussion (Attachment I)
5/13/02	Status Changed	Candidate is now in Development and scheduled to be implemented on 8/19/02
7/18/02	Discussed at Monthly CMP Meeting	25497 discussed at July Systems CMP Monthly meeting; please see Systems CMP Distribution Package July CMP -- Attachment L
7/19/02	Communicator Issued	Notification Number: SYST.07.19.02.F.04117.IMADraftRelDoc10.01
7/26/02	Info Sent to CLEC	Notification Number: SYST.07.26.02.F.04125.IMAFinalReleaseNotes for IMA 10.01 sent to CLECs
8/22/02	Discussed at Monthly CMP Meeting	25497 discussed at August Systems CMP Monthly meeting; please see Systems CMP Distribution Package August CMP -- Attachment L
8/22/02	Status Changed	Status changed to CLEC Test in the Aug. Systems CMP meeting.
9/19/02	Discussed at Monthly CMP Meeting	25497 discussed at September Systems CMP Monthly meeting; please see Systems CMP Distribution Package September CMP -- Attachment G
9/19/02	Status Changed	Status updated to Completed

Project Meetings

9/19/02 CMP Systems Meeting

Connie Winston/Qwest indicated that this was deployed as part of IMA 10.1 and has been in CLEC Test.

Bonnie Johnson/Eschelon said that Eschelon looks at every PSN to review the Service Order that was issued by Qwest, identifying any errors vs. what was sent. This allows us to identify customer impacting errors prior to the due date so we can stop the train wreck before it happens. It's very useful, and we track all the data and open up an escalation ticket to get the service order corrected.

Connie Winston/Qwest said that Qwest believes this is ready for closure

Bonnie Johnson/Eschelon said that as we do go through this process, and have any problems, we are looking at a couple of things like on those service orders where the hunting is at the bottom of the service order that possibly is cut off and sometimes the PSN isn't available. Would we bring those issues to Jean Novak/Qwest?

Connie Winston/Qwest said yes, because before this candidate was implemented, we had some parsing problems on the service order completion record that we were sending out in the Central Region. When you brought that issue in through service management we actually had an opportunity to review it. Sometimes when we run into parsing problems, everything looks perfect until you get to the bottom of one particular order. It did some strange thing to our code that we hadn't expected and it allows us to trouble shoot and if it needs to be turned into a trouble ticket then

Information Current as of: Friday, September 27, 2002

CR # 25497

Report Name: rptOpenDetailed CR INDIVIDUAL REPORT SYSTEMS

Page 1 of 2

Open System Change Requests -- Detail

we'll open one.

A question was asked whether you have to sign up for the new functionality.

Connie Winston/Qwest said that yes, via your User Profile.

Liz Balvin/WorldCom asked if this is available through both GUI & EDI

Connie Winston/Qwest said yes. It follows your user profile.

Mike Buck/Qwest asked if there were any objections on the phone or on the bridge to updating the status of this CR to "Completed." There was no objection. The status will be updated to "Completed."

Qwest Draft Data Description**Performance Dimension:** Service Order Accuracy – via Call Center Data**Updated:** August 26, 2002**Basis:** Customer calls to Qwest's service delivery centers reporting LSR/service order discrepancies.**Purpose:** Provide an aggregate estimate of service order accuracy based on customer calls to service delivery centers.**Initial Illustrative Criteria for Implementation:**

- Includes calls with received date in reporting month, counting only the first call per order and only those that are dealing with verified order inaccuracies (i.e., orders that do not match what was ordered on the CLEC Local Service Request (LSR)) that were caused by Qwest.
- Where calls refer to multiple orders, count each such call one time for each unique N, T, or C class order. For example, if a call refers to five unique orders, count it five times in the numerator of the formula below.
- Rules governing the orders to be included in the formula below are the same as the rules used in the OP-5 PID (e.g., inward line activity only, average of current + previous month volumes, etc.).

Units of Reporting: Percent**Reporting Levels:** Statewide aggregate for all products listed in provisioning PID, OP-3.**Initial Draft Formula:**

Percent Order Accuracy = $\frac{(((\text{Number of inward line orders completed in the [prior + current months]} / 2) - (\text{Number of calls received in the reporting period that report valid order errors})) + (\text{Number of inward line orders completed in the [prior + current months]} / 2)}{2} \times 100$

Availability: July 2002 data and beyond.

**Status of “Conversion as Specified”
and “Migration by TN” Change Requests**

In mid-June, 2002, Z-Tel submitted a Change Request (“CR”) asking Qwest to modify its “Conversion as Specified” process for migrating end users.¹ WorldCom also submitted a CR at that time requesting that Qwest modify its OSS to permit conversions using only a telephone number (“Migration by TN”) for UNE-P.² Pursuant to agreed-upon Qwest Change Management procedures, these two CRs, together with all of the other CRs submitted during a specified timeframe, were prioritized for IMA release version 12.0, scheduled for deployment in April 2003.³

The change to the “Conversion as Specified” process was collectively prioritized by the parties as number two, and “Conversion by TN” was prioritized as number 19.⁴ The process to which these CRs are subject following prioritization was described in an ex parte filing in the Qwest I and Qwest II proceedings on September 5, 2002.⁵

¹ Z-Tel’s request for a modification of the “Conversion as Specified” process was designated as CR SCR060702-01.

² WorldCom’s request for “Migration by TN” was designated as CR SCR061302-01.

³ WorldCom’s CRs were submitted the week IMA 10.0 was implemented, and after the prioritization of CRs for IMA 11.0, scheduled for deployment in November 2002, had occurred. Thus, pursuant to the Change Management Process, the next possible major IMA release in which WorldCom’s CR’s could be implemented was IMA 12.0.

⁴ See Exhibit 2-1 (Qwest Wholesale Change Management Process Meeting Minutes, September 19, 2002) at 1.

⁵ See Qwest 09/05/02a Ex Parte (Response to WCB on Prioritization of TN Migration and Migration as Specified According to CMP).

On August 23, 2002, over two months after its submission of the original CRs, WorldCom submitted an Exception Request, asking Qwest to implement the change to the “Conversion as Specified” process and the “Migration by TN” feature before the end of 2002.⁶ Current options for expediting CRs are the Late Adder Process, the Special Change Request Process, and the Exception Process. WorldCom chose to invoke the Exception process. Exception Requests such as the one submitted by WorldCom permit a party to request that a particular CR bypass the documented Change Management Process (“CMP”), and instead be implemented outside of that process. To preserve the integrity of the CMP and ensure that no CLEC is disadvantaged by a departure from the standard process, the agreed-upon CMP guidelines require that Exception Requests of this nature be approved unanimously by CLECs to be implemented.⁷

On September 19, 2002, at the Monthly Systems CMP Meeting, CLECs convened to, among other things, vote on whether to authorize WorldCom’s Exception Request.⁸ Following a brief question and answer session in which Qwest described the procedures it would deviate from – and the resources it would have to devote – to implement the change to the

⁶ See Exhibit 2-2 (WorldCom Exception Request SCR082302-01EX, August 23, 2002).

⁷ See, e.g., Qwest II Declaration of Dana L. Filip, Change Management, at ¶¶ 96-97.

⁸ The other aspects of the meeting are not reflected in the attached meeting minutes.

“Conversion as Specified” process and add the “Migration by TN” feature in advance of IMA 12.0, the CLECs voted on the Exception Request. It is worth noting that during the question and answer period, Qwest explained that other options to expedite the implementation of migration by “Conversion as Specified” and “Migration by TN” existed. For instance, Qwest noted that work could be done to covert the IMA 11.1 point release in January or February 2003 into a new special major release.⁹ WorldCom rejected this option.¹⁰

Ultimately, six CLECs voted in favor of WorldCom’s Exception Request, five CLECs opposed it, and three CLECs abstained from voting. Qwest voted to oppose the Exception Request. Notably, AT&T and Eschelon, both of whom provide local service through UNE-P, opposed WorldCom’s Exception Request. Because these CRs were not approved unanimously, they were not adopted. CLECs were notified of this outcome on September 24, 2002.¹¹ Qwest will continue to target these two CRs for inclusion in IMA 12.0, which, as noted above, is scheduled for release in April 2003.

⁹ See Exhibit 2-1, (Qwest Wholesale Change Management Process Meeting Minutes, September 19, 2002) at 1.

¹⁰ See *id.* at 2.

¹¹ See Exhibit 2-3 (Qwest Notification Regarding SCR082302-01EX, September 24, 2002).

Qwest Wholesale Change Management Process (CMP) Meeting Minutes**Meeting Minutes****Treatment of
SCR082302-01EX (Implementation of Multiple CRs Prior to IMA 12.0)
As an Exception to CMP****September 19, 2002 2 p.m.
Inverness Hotel – Conference Room D****Meeting Start Time: 10:15 a.m.**

NOTE: The meeting began at 10:15 a.m. MT. The meeting took place as an agenda item during the September Monthly Systems CMP Meeting. The Exception component of the meeting was originally scheduled for 2:00 p.m. but was rescheduled to 10:15 a.m. at the request of and without dissent from the CMP meeting attendees.

PURPOSE

The purpose of the Exception Meeting was to decide whether to treat SCR082302-01EX (Implementation of Multiple CRs Prior to IMA 12.0) as an exception to the CMP. A vote was planned and noted in the agenda.

ATTACHMENTS

NOTE: Because the exception meeting took place as an agenda item on the Monthly Systems CMP Meeting a full list of CMP Meeting attendees can be found in the meeting attendees list for the September Monthly Systems CMP Meeting.

MEETING MINUTES

Michael Buck/Qwest — Introduced the exception request (SCR082302-01EX) from WorldCom and asked Jeff Thompson/Qwest to do a recap of the request and the analysis done ~~to date.~~

Jeff Thompson/Qwest — The request seeks to implement two CRs from the IMA 12.0 prioritized list by December 31, 2002. The two CRs are SCR060702-01 (Migrating Customers using the Conversion As Specified Activity Type) and SCR061302-01 (Migrate UNE-P Customers by TN). They were ranked #2 and #19, respectively, during the IMA 12.0 prioritization process.

Qwest has analyzed the CRs and the request to deploy by the end of 2002. The nature of the CRs requires all the functions for CLEC-impacting candidates be done, including: technical specifications, production migrations, testing, training etc. All of these activities are typically done as part of a major release effort. Therefore, implementation of these two specific CRs would require a major release effort. Qwest examined the feasibility of implementing these CRs in the next scheduled major release (in November.) However the November release is too far along at this point for these CRs to be added. There is the IMA 11.1 point release in January. So we could convert those resources and create a new special major release for these two CRs. The new special major release could be delivered in January 2003. Both SATE and IMA could be delivered at the same time. If that's not acceptable to CLECs, SATE could deliver in January with delivery of the IMA special major release in February. The working assumption for the analysis that Qwest has done was that WorldCom's desire to accelerate these CRs would mean implementing these in January. However, for the most part, the implications of early delivery apply regardless of when the special major release would be delivered.

Qwest then looked to determine the work impacted. Implementing a special major release for these CRs in the timeframe noted would require a very aggressive development schedule creating a lot of risk to the release itself. The risk is that there is less time to recover from any issues, known or unknown, which may come up. With a

Qwest Wholesale Change Management Process (CMP) Meeting Minutes

normal release schedule, there is time to correct issues. In this case, however, with an accelerated schedule, there would be minimal time for corrections.

Associated functions for documentation and training would also be impacted. Disclosure of technical specifications would probably be missed by about 30 days. Instead of the required 73 days for disclosure of draft technical specifications, Qwest would have to deliver them around 45 days or sometime around then. This leaves less time for CLECs to implement required changes on their side. Such compression of the timeline cascades down from there. Training for 11.0 would have just been completed so there would be back to back training which would affect both Qwest and the CLECs.

To accelerate these two CRs would also require resources to be diverted from the 12.0 development efforts. Qwest would augment the IMA 11.01 point release resources with resources from the IMA 12.0 release. That would result in pulling those resources away from the IMA 12.0 release work. Based on the Levels of Effort (LOE) given today, it is anticipated that about 13,000 hours would need to be pulled from the IMA 12.0 release to get these two CRs done in time. It would appear at this point that, in addition to the two CRs being discussed, another candidate from 12.0 would also need to be dropped. There are currently two CRs tied for #17 and an assessment would need to be made in order to determine which CR would need to be dropped. Jeff reviewed the two CRs that are tied for #17 priority.

In addition to consequences for acceleration and resources, we (Qwest and CLECs) have agreed to the CMP which has established rules for governing how we do business together (i.e. Qwest and CLECs). This exception would break some of those agreements. It would break the agreement of not having major releases 3 less than months apart. Also because these releases are so close together, implementing these two specific CRs early would impact sunset dates. As Bonnie Johnson/Eschelon alluded to before, there are only 3 hardware platforms. Because the special major release would need to be deployed on one of those platforms, other major releases would need to be retired earlier than currently planned. The sunset for IMA 10.0 would be April, possibly March. This is a constraint of Qwest's hardware operating environment.

This acceleration would also overturn the prioritization process by taking CRs #2 and #19 out of order and putting them in an earlier release. This would also result in overturning two previous unanimously approved exception CRs. The CR submitted by Qwest (SCR080502-01EX – Exception to Section 10.2.2 for IMA 12.0 Prioritization) to have 12.0 worked with 50% LOSG candidates and 50% from the prioritized list, and the CR submitted by WorldCom (SCR081402-01EX – Exception to Section 10.2.2 for IMA 12.0 Prioritization) to have 12.0 be 100% from the prioritized list.

In some of the previous dialogue, WorldCom had asked where these candidates were in the development phase. They are currently in definition.

Jeff Thompson/Qwest — That's where we're at. This is an assessment of what it would take to do these two specific CRs in an early special major release. Are there any questions?

Liz Balvin/WorldCom — WorldCom only brought these CRs forward because of an Ex Parte conversation that Qwest had with the FCC. Qwest indicated that Section 16 could allow for expedited treatment outside of a normal planned release. Qwest went on to say that no CLECs had requested these two CRs to be implemented prior to 12.0. Therefore WorldCom felt this was an option that we could pursue. It seems to WorldCom that the exception process does not appear to be an option. I believe there are some restrictions in the CMP document, not only the ones Jeff just referenced – 'three months in-between a major release' – plus it requires having 3 majors a year. Jeff talked about all the things that would have to be changed, but the biggest impact will be on resources which you will always have and that's why this is a unanimous vote. Just to reiterate, these are critical CRs to WorldCom. In Qwest's response, they indicated that they are currently defining the top 19 CRs. If we could get it by April, that would benefit us as well. We would not have pursued this if Qwest had not said this was an option to the FCC.

Judy Schultz/Qwest — I do think the exception process is an option for requests like this. With more lead-time, there may have been more options for this request. It may have been possible to include these CRs in the IMA 11.0 release. I don't want to discourage anyone from considering the exception process. In this case, it really is a timing issue.

Liz Balvin/WorldCom — I think this is a timing issue regardless, it will be impacting to resources throughout the year.

Qwest Wholesale Change Management Process (CMP) Meeting Minutes

Judy Schultz/Qwest — There will always be ramifications, but, if the exception CR is submitted early enough, there would be time to work through the issues. Again, in this case, if the request had been submitted earlier, it could potentially have been addressed in the IMA 11.0 release.

Jeff Thompson/Qwest — The ramifications will be different each time, depending on the nature of each exception request. There have been other exception CRs, like the next exception CR, for example, where the ramifications are different. The exceptions need to be treated individually and this forum is where we get to discuss whether we want to head down the path of an exception. This doesn't invalidate the process but demonstrates that the process works.

Liz Balvin/WorldCom — And you won't know what those ramifications are until you submit the CR. WorldCom also doesn't want to discourage anyone from using the exception process. It seems that for getting CRs in prior to a scheduled major release, the only option seems to be the SCRP where you pay for resources and then it wouldn't impact anything.

Jeff Thompson/Qwest — Clearly bringing on additional resources would lessen the constraints. However, the SCRP should not be characterized as the only option.

Mike Buck/Qwest — Asked if there were other comments or questions. No comments.

Mike Buck/Qwest — Reviewed the quorum calculation. The results of the quorum calculation indicate that 7 or more carriers constitute a quorum. Mike also reviewed the list of carriers in attendance at the meeting. Mike reminded everyone that this was a unanimous vote as discussed and agreed to in the ad hoc meeting. He pointed to the notice included in attachment P describing what was meant by "Yes" and "No" votes. He also read from the Wholesale CMP Process document section 16.4.1, which indicated that the vote is "taken only to determine whether the Exception Request will be handled on an exception basis. The requesting party may still pursue its desired change through the established CMP."

Bonnie Johnson/Eschelon — Commented that if you vote "yes" you support going forward with this exception CR if you vote "no" it will not go forward.

Liz Balvin/WorldCom — Reminded everyone that the notification indicated a "yes" vote was a preference for Qwest to allocate the resources to go forward with December date. She indicated that WorldCom chose not to change the date requested for implementation of these CRs to January. She asked to be sure that the e-mailed vote is also read out.

AT&T — No

Covad — Abstain

Eschelon — No

McCleod — No

NC Telcom — Abstain

Popp Communications — Abstain

SeviSense — Yes

Time Warner Telecommunications — Yes

USLink — Yes

Vartec — Yes

WorldCom — Yes

Z-Tel — Yes

Allegience — No

Qwest — No

Integra — No

Qwest Wholesale Change Management Process (CMP) Meeting Minutes

Mike Buck/Qwest — Confirmed that all carriers in room and on call were accounted for. Indicated that the request to treat these two CRs on an exception basis as described was not agreed to by a vote of 6 “No” votes, 6 “Yes” votes, and 3 “Abstain” votes.

Mike Buck/Qwest — Asked if there were any other questions. There were none.

Open System Change Requests -- Detail

Report Record # 1					
CR #	Title	Status Date	Level of Effort	Interface Release #	Products Impacted
SCR082302-01EX	Exception Request to Implement Multiple CRs Prior to IMA 12.0	Submitted 8/23/02		IMA Common	

Originator: Balvin, Liz

Originator Company Name: WorldCom

Director: Thompson, Jeff

Owner: Thompson, Jeff

CR PM: Stecklein, Lynn

Description Of Change

As excerpted from an August 22, 2002 email from Elizabeth Balvin/WorldCom to Michael Buck/Qwest -

"Exception:

To implement the following CRs SCR060702-01 Migrating Customers using the Conversion As Specified Activity Type and SCR061302-01 Migrate UNE-P Customers by TN prior to IMA 12.0 planned production release of April/03.

Description of request with good cause for seeking an exception:

Qwest is currently not industry compliant because of its requirements surrounding migrate as specified and the fact that migrate by TN currently is not available. Currently, when migrating as specified, CLECs are obligated to differentiate between features the customer already has and features the customer desires for the first time. They are also forced to include the customer's service address and customer code on every order, and must retrieve new customer codes before submitting supplemental orders. The requirement for additional information places the burden on CLECs to pull, populate and verify information prior to order submission -- all steps that reduce efficient ordering and provides greater room for error. NOTE: Requested migrate as specified capabilities existed prior to IMA release 6.0.

Desired outcome:

That the migrate as specified and migrate by TN CRs are implemented by Qwest per OBF guidelines no later than the end of 2002.

Supporting documentation:

1) "Qwest's Wholesale Change Management Process Document - 7/10/02", section 16.0 states "If the Exception Request is for changes to CMP timelines and sets forth specific dates for completion of tasks, a two-thirds majority vote will be required unless Qwest or a CLEC demonstrate, with substantiating information, that one of the criteria for denial set forth in Sections 5.1.3 or 5.3 is legitimately applicable. If one of the criteria for denial will cause such an exception request to be rejected, the requestor may withdraw the specific dates from its exception request at the meeting where it is discussed, in order to have the two thirds majority vote apply to the request." Thus WCom believes a two-thirds vote would be required to implement the requested changes prior to IMA 12.0 planned production release date of 4/03.

2) Qwest's Ex Parte dated August 13, 2002 addressing the staff of the Wireline Competition Bureau requests states "The Exception Process, specified in Section 16 of the CMP, provides the ability for a CLEC or Qwest to request a deviation from the CMP. This process could be used to request expedited treatment or implementation outside of the normal planned release". Thus WCom requests the identified CRs be implemented outside the normal planned IMA release date of 4/03.

VOTE: That CRs SCR060702-01 Migrating Customers using the Conversion As Specified Activity Type and SCR061302-01 Migrate UNE-P Customers by TN are implemented by Qwest no later than the end of 2002. A "yes" response would require Qwest to implement by the end of 2002. A "no" vote would require the CRs to follow the processes currently imposed by the Qwest Wholesale Change Management Process Document."

Status History:

Date	Action	Description
8/23/02	CR Submitted	
8/23/02	CR Acknowledged	
8/27/02	Communicator Issued	Notice CMPR.08.27.02.F.01320.CMP_Meeting_Vote issued
8/28/02	CLEC Provided Information	Requests to discuss issue in re-design received from Eschelon and WorldCom (see Project Minutes for details)
8/30/02	Communicator Issued	Notice CMPR.08.30.02.F.01322.Ad_Hoc_CMP_Mtg issued
9/04/02	Communicator Issued	Notice CMPR.09.04.02.F.01323.Ad_Hoc_Mtg_Revision issued

Information Current as of: Friday, September 27, 2002

CR # SCR082302-01EX

Report Name: rptOpenDetailed CR INDIVIDUAL REPORT SYSTEMS

Page 1 of 9

Open System Change Requests -- Detail

9/10/02	Communicator Issued	CMPR.09.10.02.F.01324.Ad_Hoc_Mtg_Material
9/19/02	Discussed at Monthly CMP Meeting	SCR082302-01EX discussed at September Systems CMP Monthly meeting; please see Systems CMP Distribution Package September CMP -- Attachment P

Project Meetings

Meeting Minutes Ad-Hoc meeting for WorldCom CR SCR082302-01EX Wednesday September 11, 2002 @ 11:00 a.m.

Bridge Call open to all CLECs This meeting was held to discuss the questions raised around WorldCom's exception request SCR082302-01EX. MBuck/Qwest held roll call and reviewed all of the participants that were on the conference bridge. Everyone in the room announced themselves. Michael stated that the purpose for this ad hoc meeting was to discuss the questions raised regarding WorldCom's exception request. He provided a brief overview of the CR and he pointed to the notice that went out with the questions and answers. The questions: 1. More details provided by Qwest to better understand if this change request is approved, what would be the end result impact? What in addition to timeline changes (disclosure documentation requirements) does Qwest believe will apply?

What is the progress to date surrounding these CRs? "Migrate as specified" business development requirements should have begun as of July 26, 2002.

Did Qwest account for the fact that migrate as specified functionality existed prior to IMA 6.0 when estimating its man-hours? Has there been any analysis performed on "migrate by TN" (synergies?). Are the man-hours established for "migrate by TN" still considered appropriate? How would Qwest resources be diverted

How would the 12.0 prioritization list be impacted? What additional man hours would be estimated? What "voting" standard must apply (2/3rds or unanimous) Is it possible to treat the CRs separately given their 12.0 ranking status? Example: "migrate as specified" will be implemented in April/03, would only "timeline" changes apply?, thus 2/3rds vote 3. What other options are available to address the Exception CR and lessen the impact on the 12.0 release?

J Thompson/Qwest Reviewed the analysis that was done in answer to the questions that were submitted by WorldCom. He noted the 2 CRs that WorldCom has asked to have accelerated. Jeff spoke to the high level points included in the detailed feedback Qwest had provided. He noted that both CRs are CLEC impacting candidates that affect GUI & EDI, therefore the activities associated with a major release must be done. Therefore, this leads to the need for a major IMA release. Qwest looked at the schedule and determined that the development process is too far along the path for IMA 11.0 to get these two CRs included in the IMA 11.0 release so Qwest ruled that out. Qwest has a point release (IMA 11.1) scheduled for January. The most doable thing would be to convert the planned point release to a major release, leave it in January, and do required additional activity that is associated with a major release (including SATE). Qwest would probably deliver SATE in conjunction, in January because of the schedule. If Qwest and the CLECs can't agree to do that, then Qwest could push the new major release out to February and deliver SATE in January. Because the request is to have it done by December, Qwest evaluated the possibility of the January date. Regardless of the date, scheduling a new, accelerated major release has the following implications:

1 This would produce a short schedule for Qwest and CLECs. If CLECs want to benefit from this acceleration, they would have to do work to assume those benefits.

2 The acceleration of candidates carries its own risks. The development scheduled is shortened by 2 months. If something goes wrong, Qwest doesn't have as much time to recover as there would be on an April delivery schedule, causing Qwest not to deliver on time. He noted that it's just risky.

3 All the documentation would be less than the 73-day requirement. Because of the short, aggressive timeline, Qwest probably wouldn't be able to make the 73 days for technical specs. The DRAFT specs would probably come out at the time the finals would normally come out.

4 Training on 11.0 will have just been delivered. More training schedules will have to be released. There will probably be some overlap causing back-to-back training.

5 Resources would be taken away from 12.0 in order to meet the acceleration. The candidates are using the high end of the LOE because of the nature of acceleration. Qwest doesn't have detailed numbers. Qwest did the estimates using the high numbers (Jeff reviewed the numbers in the response). In addition to the 2 CRs that get pulled up, Qwest and the CLECs would need to figure out which of the 2 CRs that tied for the #17 slot, would be eliminated from the release as well. Those are consequence for accelerating.

6 Impacts to CMP commitments: The CMP process requires that Qwest can't have major releases less than 3 months apart. This would be violated (either with the January release being too close to the November 18 release date for IMA 11.0 or a February release being too close to the April 7th date for IMA 12.0). So that CMP obligation would not be met.

7 Sunset impacts: The process states that Qwest will support the previous IMA release for six (6) months after the next major IMA EDI release has been implemented. J Thompson/Qwest noted that the 3 hardware production platforms are only to support 3 releases. He reviewed the changes in retirement date for 10.0, and noted that we just received a CR to extend that date. He added that the WorldCom request would move shorten the sunset timeframe for 10.0 rather than lengthen it.

8 Noted that there has been a lot of churn on the IMA 12.0 release already. He indicated that CLECs have created issues around the prioritization process and that this is now the third exception on how the IMA 12.0 release should be handled. So far, there has unanimous agreement on how resources are to be used. This is causing lots of churn and exceptions for resources. Another way to address this would be to invoke the SCRP to get additional resources applied. As the CLECs continue to induce churn, Qwest continues to induce change in the way resources are applied to this release. This impacts issues that Qwest has to look at in dealing with this CR. He added that it is important to note that invoking the SCRP process would minimize the churn. J Thompson/Qwest Noted that this is the initial take on an additional release. He added that both of the CRs in the WorldCom request are on different Business Requirements schedules for completion and that there has been no synergy identified between them. He added that once the specifications for the changes are completed, Qwest will revisit the LOEs to see if they need to be changed. He concluded by reiterating that this is the summary of Qwest's analysis of the impact of this CR. Bonnie Johnson/Eschelon Asked if Qwest could explain about how this would impact the sunset of IMA 10.0. Terry Wicks/Allegiance indicated that he has an interest in the IMA 10.0 sunset as well. J Thompson/Qwest Stated that Qwest has 3 platforms. He explained that normally, in this situation, Qwest would run IMA release 10, 11 & 12 on those 3 hardware platforms. When it came time to run 13, Qwest would retire 10 so the hardware would be available to run 11, 12 & 13. So in that scenario, Qwest would retire IMA 10.0 when it is forced to go on 13. IMA 13.0 is currently scheduled for August, because Qwest needs time to prep the platforms. Donna Osborne-Miller/AT&T Asked if Qwest put the WorldCom major release in, then what would the sunset date be. Jeff

Thompson/Qwest Replied that 10.0 might sunset as late as April. He added that Qwest would hang on as long as possible to the platform. He added that it might have to be March. And that these are all preliminary assessments. One thing is clear, it would not be May or later. Bonnie Johnson/Eschelon Asked if that would matter if it was the point releases. J Thompson/Qwest Clarified that it wouldn't matter. The fact that Qwest has to create a new code base causes Qwest to change platforms. Liz Balvin/WorldCom Requested clarification around the concept of a major release. WorldCom views this request as a 'mini-major.' What would the impacts be for us as end users? She stated that the changes to CMP

Open System Change Requests -- Detail

documentation would be against the 2 CRs only, and asked if that was right. JThompson/Qwest Confirmed that there would be documentation changes. But the impact would be more than just documentation. Qwest must assume that if the CLECs approve this then the CLECs must want to use it. In order to use it they would need disclosure, they need to be able to test, etc. He noted that if the CLECs want to do this, the CLECs must want to use it early. Liz Balvin/WorldCom Stated that her point is that it's not truly a major release because it's not 40,000 hours of coding changes. She noted that because Qwest is using a point release, the functional changes that exist are only based on 2 CRs. JThompson/Qwest Clarified that he was not suggesting Qwest use a point release. He was saying that Qwest could abolish the point release to use the timeslot for the major release. He noted that the definition of major versus point doesn't hinge on LOE, it hinges on level of CLEC impact. The question is whether CLECs would need to make code changes, need a test environment, etc. Adding that if the CLECs are looking at that definition, then the answer is clearly yes, it's a major release. Liz Balvin/WorldCom Indicated that she did understand what Jeff Thompson was saying, but that this release would not be adding any other functional changes but these 2 CRs. JThompson/Qwest Jeff confirmed that the proposed major release would be for delivery of the 2 CRs in question. Delivery of the functionality for these 2 CRs and all the related activities would constitute a major release. Donna Osborne-Miller/AT&T Asked if it would be a major release because of coding impact? Jeff Thompson/Qwest Confirmed that she was correct. Liz Balvin/WorldCom Confirmed that there would be no coding or functionality changes with the currently scheduled point release. JThompson/Qwest Clarified that there is one spillover candidate disclosed as part of the major release, and added that there is no coding impact with that change. Liz Balvin/WorldCom Asked that if this Exception CR was approved, would there be coding changes required for the other CLECs. JThompson/Qwest Confirmed that there would be. Liz Balvin/WorldCom Asked about the comment in Qwest's feedback concerning the 40,000 hours. Qwest will most likely be able to address the top 19 CRs? Does that mean that #19 is going to make it in the IMA 12.0 release? Jeff Thompson/Qwest Indicated that it is too early in the process to say. He indicated that for now Qwest needs to plan as if Qwest is going to make it all the way through #19 on the CR prioritization list. He noted that the process is to complete requirements analysis and communicate that in the packaging discussion in November this year. He added that Qwest would continue with design, then begin code, then provide the final commitment in December.

Liz Balvin/WorldCom Indicated that she has played the numbers game and didn't know how Qwest believes they can get to #19.

JThompson/Qwest Reiterated that this goes back to the way the process is worked. From a process standpoint Qwest must define further down the CR prioritization list than we estimate we will actually get. By doing this, we might find synergies with candidates further down. Also, we might re-LOE some CRs, causing candidates to go higher or lower on the list. It's early in the process, but at this stage, Qwest has to work this list as if this will make it into the release. In November Qwest will bring the results forward to discuss exactly what can make it in the release and why. He noted that right now Qwest has to work it as if it could make the release.

Donna Osborne-Miller/AT&T Mentioned that Liz (Balvin) had concerns about this prior to today. She noted that the Migrate as specified CR existed prior to IMA 6.0. She asked what had happened that caused the CMP process to lose that. JThompson/Qwest Stated that we have had that detailed conversation before in a Monthly Meeting. At a high level, he recapped that there were a series of issues, some concerns around converting the wrong account, adding/deleting the wrong feature, and a whole series of issues between Qwest & the CLECs, that lead Qwest to beef up how those conversions were done. The result is that more information is required from the CLECs to ensure those service issues did not occur. He added that it morphed into what Qwest believes is the higher quality implementation that exists today. Donna Osborne-Miller/AT&T Noted that she didn't know if a CR came forward in between then and now to change this? JThompson/Qwest Clarified that it was a whole series of smaller CRs that morphed the capability. Terry Wicks/Allegiance Asked if we clarify that this alters timeframes, would the vote be unanimous or two-thirds? JThompson/Qwest Responded that he didn't think the analysis dictated whether it would be unanimous or 2/3. However, he did point out that the analysis shows this Exception Request would change more than just timelines, this would have broader impacts to CMP. Additionally, it would overturn 2 other Exception CRs that were agreed to with the unanimous vote. Terry Wicks/Allegiance Indicated that in order to be prepared for next week's vote, we need to know how the voting would be handled. Donna Osborne-Miller/AT&T Asked for clarification on which 2 unanimously approved Exception CRs would be overturned by the current WorldCom Exception CR. JThompson/Qwest Clarified the two CRs to be overturned: 1) Qwest exception CR regarding full LSOG versus 50/50 and 2) WorldCom exception that sought prioritized 12.0 list versus 50/50. He indicated that there is a different resource issue for 12.0. He referred to the churn issue that he was talking about earlier. Terry Wicks/Allegiance Asked how the CLEC community would go about making the decision.

Liz Balvin/WorldCom Stated that she thinks it is important for WorldCom in dealing with IMA 12.0. She recapped that Qwest came forth to say they wanted the 50/50 option. WorldCom wanted another option and submitted a CR. Looking at the end result, we weren't going to get more functionality for LSOG and it was unanimously voted to keep the list as is. This third Exception CR came as a result of information Qwest provided to the FCC, per section 16, that a CLEC could use this process to request expedited treatment of the release. WorldCom understood this to allow for a change request to change timelines. If you look at the correspondence between Qwest and WorldCom, it will change a lot more than timelines. On one side Qwest is saying this is an option, to the FCC, when WorldCom submits the changes, it truly is not an option, we've been told the real option is SCRP. JThompson/Qwest Indicated that the exception process truly is an option. He noted that it is a fact of this particular case, that it might not be a good option because of the impacts. He noted that he could envision other circumstances where it is a good option. The process is there, and it is worth the attempt and it allows the discussion to take place. Qwest has brought forward how we analyzed this. The objection in this case, it seems, is with the outcome. If a CR was submitted to change IMA 19, for example, that would probably work because there is enough lead-time. It's not a problem with the process; it's this specific CR. Liz Balvin/WorldCom Stated that she thought that it was unrealistic to change IMA 19. Noting that it's so far down the pipeline. JThompson/Qwest Commented that he didn't intend a trivial example. The point is that the exception process exists and it works. He noted that with Exception CRs that Qwest had dealt with before, for example: the sunset dates for extending the process, that those CRs had worked.

Liz Balvin/WorldCom Stated that this proves the point that WorldCom's original exception CR cannot be implemented regardless if there is a vote, and that it was evidenced by the correspondence that has been going back and forth. The original intention of the WorldCom CR can't be met. She noted that there's no vote that can change that. It looks like what's on the table is to shift 11.1 candidates and divert the 12.0 resources. It looks like they will implement both by the April timeframe.

JThompson/Qwest Noted that Qwest is working under that assumption today. He added that Qwest can in no way commit to that. He stated that the process says Qwest will deal with that at packaging. Both are in requirements definition, both will be examined and Qwest will get back to the CLECs at the appropriate time according to CMP. Liz Balvin/WorldCom Asked if that is in November. JThompson/Qwest Confirmed that it was. Liz Balvin/WorldCom Asked if the soonest Qwest can do it is with the Jan/Feb proposal. She noted that the CLECs would be faced with all the impacts documentation, training, SATE, sunset.

JThompson/Qwest Confirmed that with current assumptions that was correct. Liz Balvin/WorldCom Asked, where do we sit? She stated that it sounds like our exception CR has been rejected, I need to understand what Qwest's thought is. What's the vote? M Buck/Qwest Stated that he thought it's not Qwest's decision alone, it's a community decision. He stated that from a process standpoint, it would seem that the decision is whether to treat the CR as an exception. He asked what other CLECs thought. Terry Wicks/Allegiance Indicated that if these 2 CRs are implemented as Jeff Thompson/Qwest has attempted to outline, it would result in another release. What affected Allegiance is the sunset of IMA

Open System Change Requests -- Detail

10.0 a month earlier because he had planned to request to extend this at least 6-8 weeks later.

Donna Osborne-Miller/AT&T Noted that the whole year's planning is critical to an EDI development person, as well as all of the CMP development deliverables.

Liz Balvin/WorldCom Explained that WorldCom didn't want to change the whole CMP to accommodate these CRs. She noted that WorldCom believed the functionality is critical to their business. She stated that this falls back on the process. It seems that Qwest is rejecting the request. She noted that if the group does move forward with the exception CR, it is not as it was originally intended. M Buck/Qwest Stated that he didn't think Qwest shares the view that the CR is being rejected. The process calls for voting on whether or not to treat the CR as an Exception. The CMP could still vote to treat this as an exception request if WorldCom wishes to do so, noting also that Qwest has outlined the implications and offered alternatives. Terry Wicks/Allegiance Clarified that a vote of yeas that these would be implemented on December 31, 2002. He indicated that the inclusion of a specified date on the exception didn't seem appropriate at this time. He also clarified that there would be no vote at today's meeting. The vote was planned for next Thursday's CMP Meeting. M Buck/Qwest Agreed with that. He stated that is why Qwest believes that the vote should be on whether to treat the CR as an exception. He noted that WorldCom has the option, under the process, to adjust their request in light of new information. Additionally, regardless of when this CR might be done (i.e. December, January, or February) it would still impact the sunset timelines. Terry Wicks/Allegiance stated that this exception has to be unanimous. Donna Osborne-Miller/AT&T Agreed. M Buck/Qwest Stated that Qwest also agreed. Liz Balvin/WorldCom Noted that she thought the vote option that WorldCom has put on the table has changed. Terry Wicks/Allegiance Clarified that the change was from December to February. Connie Winston/Qwest Noted that it would be February if Qwest has to adhere to the SATE implementation in January. She stated that Qwest was going to take a one-moment break from the call to discuss the issue. M Buck/Qwest Stated that Qwest is trying to answer the question as to what the vote is that we go forward with. If WorldCom wants to remove or adjust the dates, Qwest can do that, or we can go forward with it the way it's written. Again, the question is whether to approve an exception to the process. Liz Balvin/WorldCom Stated that this will always happen. It's going to be an ongoing problem. M Buck/Qwest Stated that that's a result of the process that's been agreed to. Liz Balvin/WorldCom Replied that she doesn't believe that the option that was provided to the FCC is truly an option. Connie Winston/Qwest Responded that the Exception process is certainly always an option. She noted that it's the specifics of a particular CR that drives its feasibility. Adding that it's not that Qwest doesn't want to look at the options. She noted that sometimes it will work.

Liz Balvin/WorldCom Stated that it seems Qwest cannot accept the original request. So going forward, does Qwest reject this CR, or do you expect Qwest to change the CR? Bonnie Johnson/Eschelon recalled that there was one of these a couple of months ago. She noted that we did collectively agree that since Qwest was unable to meet the original request that the CR be denied. M Buck/Qwest Clarified that the one Bonnie was thinking of was not an exception request.

Bonnie Johnson/Eschelon Agreed with Michael that the previous example was not an Exception. She stated that she thought there was another CR like this that was discussed. Liz Balvin/WorldCom Stated that she did recall that too and that she thought that was what we're faced with today.

M Buck/Qwest Stated that he thought the example we are looking for here is the Covad exception where Qwest was requested to move the sunset date beyond a date that Qwest could accommodate. After consultation between Covad and Qwest, Covad changed the date in their Exception CR and the CR was unanimously accepted. Terry Wicks/Allegiance Stated that we need to vote on whether to accept this as an exception CR. M Buck/Qwest Stated that Qwest agrees and believes we are voting on whether or not to treat this as an exception. Liz Balvin/WorldCom Explained that the WorldCom CR is requesting a specific date and that Qwest is saying that it can't meet the date. M Buck/Qwest Mentioned that if WorldCom choose to go forward with it as an exception, Qwest is prepared to vote on whether to treat this as an exception. He stated that he believed that the question goes to all the CLECs. Qwest was asked to examine the risks and had done so. Based on the feedback and impacts Qwest has identified, Qwest and the CLECs need to decide whether there is a desire to consider this request as an exception to the process. Determining whether the impacts are acceptable, regardless of the date, is the purpose of voting whether to treat the CR as an exception. Liz Balvin/WorldCom Stated that the key is that Qwest is asking WorldCom to remove the date. M Buck/Qwest Stated that he didn't believe that Qwest was asking WorldCom to remove the date. He noted that the interpretation that Qwest has is that we need to decide on whether to move forward with this as an exception. According to the process, if the vote is in favor, a schedule for subsequent activities would need to be agreed to. He stated that he thought Terry Wicks had said it much better than he did. Monica Avila/Vartec Stated that Jeff Thompson had mentioned that Qwest felt that the changes could not be implemented by the end of 2002. Liz Balvin/WorldCom Indicated that she had heard the same thing and it was included in the answers Qwest had provided to WorldCom's questions. Monica Avila/Vartec Stated that she didn't see that. Liz Balvin/WorldCom Pointed out that it was on page 9 of the CR response. Terry Wicks/Allegiance Asked Liz Balvin if she was opposed to voting as it is stated? If we want to say yes, and we leave the date in there, then the exception either way passes or not. If it passes then Qwest will have to prove how they can't do it. Liz Balvin/WorldCom Stated that this would have to be a unanimous vote. She added that if a vote is taken today to see if we can get it in, it sounds like we are faced with taking a vote to move forward as it stands now. She added that a yes vote would say to implement the CR as it is written. M Buck/Qwest Stated that it's up to WorldCom. Qwest can conduct the vote on the exception as it's written, but if WorldCom chooses to change the language of the exception, Qwest can conduct the vote on that. Donna Osborne-Miller/AT&T Asked that if WorldCom changed the title, then this wouldn't be an exception CR. Terry Wicks/Allegiance Responded by saying that if we follow the process, we have to vote on this, yes or no, to be an exception without altering the date or anything because the notice has gone out. The purpose of this meeting was to gather more information. M Buck/Qwest Indicated that if there was a desire to change the wording a notice could probably go out to the entire community with the updated wording. But, yes, Qwest agrees that there needs to be a vote on whether to allow an exception to the process in this instance. Liz Balvin/WorldCom Asked if the group had agreed that a unanimous vote is required. Donna Osborne-Miller/AT&T Confirmed that we had. Terry Wicks/Allegiance Stated that he also agreed. Liz Balvin/WorldCom Asked if we're saying it's unanimous because it not only changes the timeline but it changes other things too. Donna Osborne-Miller/AT&T Responded that it's because it's called an exception. Liz Balvin/WorldCom Reviewed the language in section 16. She stated that WorldCom thought when writing the CR that the primary impact was changing the timelines set forth with tech specs etc. M Buck/Qwest Replied that on this call, the group seems to have clearly established that this CR, per bullet 3, seeks to change more than timelines. Liz Balvin/WorldCom Asked Michael which sections he was talking about. She indicated that she still thought they were all timeline changes. M Buck/Qwest Indicated that J Thompson/Qwest had already gone through the list in great detail. As just one example, he cited on page 9 the implication of having Major Releases less than 3 months apart. Liz Balvin/WorldCom Stated that she thought the group cleared that up that this is not a major release. M Buck/Qwest Stated that Qwest doesn't share that view. As it was previously discussed, the changes required by this exception meet the definition of a major release as defined in the process. He indicated that the view seemed to be largely shared by others on the call. Liz Balvin/WorldCom indicated that she did understand that this change would be a reallocation of resources. Terry Wicks/Allegiance stated the changes would be functional and require coding by CLECs, that's another reason it qualifies as a major release. Liz Balvin/WorldCom stated that she wanted to be clear that a unanimous vote is required and that a major reason is resources. Everyone on the call agreed that this is a unanimous vote. Terry Wicks/Allegiance clarified that for next week's vote we are voting yes or no on the CR the way it was written. Liz Balvin/WorldCom reviewed the wording in the notice and said that yes the vote would be for the CR the way it was written. WorldCom would not change the wording. M Buck/Qwest asked if there were any other comments/questions and there none. The call ended at 12:25pm.

Open System Change Requests -- Detail

Date: Aug 27, 2002 EffDate: CMPR.08.27.02.F.01320.CMP_Mtg_Vote Notification Category: CMP Target Audience: CLECs, Reseller Subject: CMP EXCEPTION VOTE REQUIRED Associated CR or System Name and Number: SCR082302-01EX Pursuant to Sections 16.3 and 17.3 of the Qwest Wholesale CMP Process Document <http://www.qwest.com/wholesale/cmp/whatiscmp.html>, the purpose of this notification is to alert the CMP community that Qwest has received an Exception Request that will be discussed and voted on at the Sept 19, 2002, Monthly Systems CMP Meeting. At this meeting participants will vote to accept or decline to treat this request as an Exception in accordance with Section 17.0 of the Qwest Wholesale CMP Document, <http://www.qwest.com/wholesale/cmp/whatiscmp.html>. Exception Request Details: Requestor: WorldCom Inc. Description of request with good cause for seeking an exception: "Exception: To implement the following CRs SCR060702-01 Migrating Customers using the Conversion As Specified Activity Type and SCR061302-01 Migrate UNE-P Customers by TN prior to IMA 12.0 planned production release of April 3. Description of request with good cause for seeking an exception: Qwest is currently not industry compliant because of its requirements surrounding migrations as specified and the fact that migrate by TN currently is not available. Currently, when migrating as specified, CLECs are obligated to differentiate between features the customer already has and features the customer desires for the first time. They are also forced to include the customer's service address and customer code on every order, and must retrieve new customer codes before submitting supplemental orders. The requirement for additional information places the burden on CLECs to pull, populate and verify information prior to order submission -- all steps that reduce efficient ordering and provides greater room for error. NOTE: Requested migrate as specified capabilities existed prior to IMA release 6.0. Desired outcome: That the migrate as specified and migrate by TN CRs are implemented by Qwest per OBF guidelines no later than the end of 2002. Supporting documentation: 1) "Qwest's Wholesale Change Management Process Document - 7/10/02", section 16.0 states "If the Ex Request is for changes to CMP timelines and sets forth specific dates for completion of tasks, a two-thirds majority vote will be required unless Qwest or a CLEC demonstrate, with substantiating information, that one of the criteria for denial set forth in Sections 5.1.3 or 5.3 is legitimately applicable. If one of the criteria for denial will cause such an exception request to be rejected, the requestor may withdraw the specific dates from its exception request at the meeting where it is discussed, in order to have the two thirds majority vote apply to the request." Thus WCom believes a two-thirds vote would be required to implement the requested changes prior to IMA 12.0 planned production release date of 4/03. (Note: Qwest disagrees with WorldCom's interpretation of the Qwest Wholesale CMP Doc, Section 16. See Decision bullet on page 2, below.) 2) Qwest's Ex Parte dated August 13, 2002 addressing the staff of the Wireline Competition Bureau requests states "The Exception Process, specified in Sect 16 of the CMP, provides the ability for a CLEC or Qwest to request a deviation from the CMP. This process could be used to request expedited treatment or implementation outside of the normal planned release". Thus WCom requests the identified CRs be implemented outside the normal planned IMA release date of 4/03. VOTE: That CRs SCR060702-01 Migrating Customers using the Conversion As Specified Activity Type and SCR061302-01 Migrate UNE-P Customers by TN are implemented by Qwest no later than the end of 2002. A "yes" response would require Qwest to implement by the end of 2002. A "no" vote would require the CRs to follow the processes currently imposed by the Qwest Wholesale Change Management Process Document." Desired outcome: "That the migrate as specified and migrate by TN CRs are implemented by Qwest per OBF guidelines no later than the end of 2002." Supporting documentation: See related CR, SCR082302-01EX, in the CLEC Qwest Change Request - Systems Interactive Reports at <http://www.qwest.com/wholesale/cmp/changerequest.html>. Logistics for Call/Meeting: This request will be discussed and voted on at the Sept 19, 2002, Monthly Systems CMP Meeting. Date: Thursday, Sept 19, 2002 Time: 8:00 5:00 MT Location: Inverness Hotel Englewood, Co 877-572-8687, Passcode: 3393947 Vote: Yes: A vote of "Yes" will indicate a preference that development efforts for IMA 12.0 be allocated first to CRs SCR060702-01 and SCR061302-01, in order for Qwest to attempt to meet a December 31, 2002 production date, and then to remaining CRs in accordance with Exception Request SCR081402-01EX. (See Qwest Notification CMPR.08.26.02.F.01319.EmergencyCall_Vote.) No: A vote of "No" will indicate a preference that development efforts for IMA 12.0 be allocated in accordance with Exception Request SCR081402-01EX. (See Qwest Notification CMPR.08.26.02.F.01319.EmergencyCall_Vote.) Decision: Qwest's position is that this request seeks a change to the prescribed manner in which Qwest will apply systems resources, outlined in Sections 5.1.3, 5.2 and 5.2.1 of the Qwest Wholesale Change Management Process Document, <http://www.qwest.com/wholesale/cmp/whatiscmp.html>; this vote requires unanimous approval to grant the exception request. Deadline for e-mail votes: All e-mail votes must be received by Qwest, cmpcr@qwest.com, no later than 6:00 AM MT on Thursday, September 19, 2002. (Please refer to Section 17.4.3 of the Qwest Wholesale Change Management Doc <http://www.qwest.com/wholesale/cmp/whatiscmp.html>, for e-mail ballot format and procedures.) Change Request Number: SCR082302-01EX Primary contact information: M Buck, Qwest CMP Manager, mjbuck@qwest.com, 303-294-1633 On August 23, 2002, Qwest acknowledged this request by e-mail. Qwest cautions that, if granted, the accelerated nature of the development required to implement this request will impact CLECs and Qwest. This request requires Qwest to attempt to implement an additional Release, including CLEC coding changes, before December 31, 2002. Additionally, if Qwest attempts to implement two CRs on a completely different timeframe than the rest of IMA 12.0 Qwest must divert resources already deployed to IMA 12.0. This resource diversion and intensified re-application will require a Level of Effort greater than that estimated prior to IMA 12.0 Prioritization (which assumed implementation with IMA 12.0 in April 2003) reducing the resources available for the remainder of IMA 12.0

Original Message

From: "Clason, Karen L." <kclason@eschelon.com> Subject: FW: CMP compliance: Change Management: Meeting Agenda & Material: GN: CMP - Exception - Vote Required, Effective Immediately To: "Judith Schultz" <jmschu4@qwest.com> CC: "liz.balvin@wcom.com" <liz.balvin@wcom.com>, "Matt White" <mbwhite@qwest.com>, "Jim Maher" <jxmaher@qwest.com>, "Bahner, Terry" <tbahner@att.com>, "Crain, Andrew" <acrain@qwest.com>, "Dixon, Tom" <Thomas.F.Dixon@wcom.com>, "Doberneck, Megan" <madoberne@covad.com>, "Green, Wendy" <wteepe@qwest.com>, "Gunderson, Peder" <peder_gunderson@eli.net>, "Helene, Mark" <mhelene@qwest.com>, "Hydock, Mike" <mkydock@att.com>, "Jacobs, Teresa" <tjacobs@qwest.com>, "Jennings-Fader, Mana" <mana.jennings@state.co.us>, "Lees, Marcia" <marcia.lees@sbcc.com>, "Littler, Bill" <blittler@integratelecom.com>, "McDaniel, Paul" <prmcddan@qwest.com>, "Menezes, Mitch" <mmenezes@att.com>, "Nolan, Laurel" <lnolan@qwest.com>, "Osborne-Miller, Donna" <dosborne@att.com>, "Powers, F. Lynne" <flpowers@eschelon.com>, "Prescott, Deborah" <dprescot@usa.capgemini.com>, "Priday, Tom" <tom.priday@wcom.com>, "Quintana, Becky" <becky.quintana@dora.state.co.us>, "Rossi, Matt" <mrossi@qwest.com>, "Routh, Mark" <mrouth@qwest.com>, "Spence, Barbara" <bxspen2@qwest.com>, "Stichter, Kathleen L." <kstichter@eschelon.com>, "Thompson, Jeffery" <jthomp@qwest.com>, "Travis, Susan" <susan.a.travis@wcom.com>, "VanMeter, Sharon" <svanmeter@att.com>, "Woodcock, Beth" <woode@perkinscoie.com>, "Zulevic, Mike" <mzulevic@covad.com>, "Baum, Carol" <cbaum@usa.capgemini.com>, "Susan Lorence" <sxloren@qwest.com>, "Hines, LeiLani" <LeiLani.Jean.Hines@wcom.com>, "Terry Wicks" <terry.wicks@algx.com>, "Benvenuto, Dan" <dbenvent@usa.capgemini.com>, "John Sheehan" <john_sheehan@frontiercorp.com>, "Wayne Hart" <whart@puc.state.id.us>, "Clason, Karen L." <kclason@eschelon.com>, "Johnson, Bonnie J." <bjjohnson@eschelon.com> I have reviewed Section 16 of the CMP document relating to Exceptions, and I do not see any provision in that Section under which Qwest can add its arguments in opposition to the Request in the written notice of the Request. If a CLEC disagrees with an Exception request, a CLEC would have no ability to make its arguments in opposition to the Exception Request in the notice. Sections 16.2 and 16.3 list the contents of the notice and they do not

Information Current as of: Friday, September 27, 2002

CR # SCR082302-01EX

Report Name: rptOpenDetailed CR INDIVIDUAL REPORT SYSTEMS

Page 5 of 9

Open System Change Requests -- Detail

include a statement by Qwest when Qwest is not the party asking for the Exception. The notice for the WCOM request, however, adds this language by Qwest: Qwest cautions that, if granted, the accelerated nature of the development required to implement this request will impact CLECs and Qwest. This request requires Qwest to attempt to implement an additional Release, including CLEC coding changes, before Dec 31, 2002. Additionally, if Qwest attempts to implement two CRs on a completely different timeframe than the rest of IMA 12.0 Qwest must divert resources already deployed to IMA 12.0. This resource diversion and intensified re-application will require a Level of Effort greater than that estimated prior to IMA 12.0 Prioritization (which assumed implementation with IMA 12.0 in April 2003), reducing the resources available for the remainder of IMA 12.0. This should be discussed in Redesign.

Original Message From: Elizabeth Balvin <liz.balvin@wcom.com>

Subject: RE: CMP compliance: Change Management: Meeting Agenda & Material: GN: CMP - Exception - Vote Required, Effective Immediately

To: "Clauson, Karen L." <kclauson@eschelon.com>, "Judith Schultz" <jmschu4@qwest.com> CC: "Matt White" <mbwhite@qwest.com>, "Jim Maher" <jxmaher@qwest.com>, "Bahner, Terry" <tbahner@att.com>, "Crain, Andrew" <acrain@qwest.com>, "Dixon, Tom" <Thomas.F.Dixon@wcom.com>, "Doberneck, Megan" <mdoberne@covad.com>, "Green, Wendy" <wteepe@qwest.com>, "Gunderson, Peder" <peder_gunderson@eli.net>, "Helene, Mark" <mhelene@qwest.com>, "Hydock, Mike" <mkydock@att.com>, "Jacobs, Teresa" <tjacobs@qwest.com>, "Jennings-Fader, Mana" <mana.jennings@state.co.us>, "Lees, Marcia" <marcia.lees@sbc.com>, "Littler, Bill" <blittler@integratelecom.com>, "McDaniel, Paul" <prmcdan@qwest.com>, "Menezes, Mitch" <mmenezes@att.com>, "Nolan, Laurel" <lnolan@qwest.com>, "Osborne-Miller, Donna" <dosome@att.com>, "Powers, F. Lynne" <flpowers@eschelon.com>, "Prescott, Deborah" <dprescot@usa.capgemini.com>, "Friday, Tom" <tom.priday@wcom.com>, "Quintana, Becky" <becky.quintana@dora.state.co.us>, "Rossi, Matt" <mrossi@qwest.com>, "Routh, Mark" <mrouth@qwest.com>, "Spence, Barbara" <bxspen2@qwest.com>, "Stichter, Kathleen L." <kstichter@eschelon.com>, "Thompson, Jeffery" <jlthomp@qwest.com>, "Travis, Susan" <susan.a.travis@wcom.com>, "VanMeter, Sharon" <svanmeter@att.com>, "Woodcock, Beth" <woode@perkinscoie.com>, "Zulevic, Mike" <mzulevic@covad.com>, "Baum, Carol" <cbaum@usa.capgemini.com>, "Susan Lorence" <sxloren@qwest.com>, "Hines, LeiLani" <LeiLani.Jean.Hines@wcom.com>, "Terry Wicks" <terry.wicks@alix.com>, "Benvenuto, Dan" <dbenvent@usa.capgemini.com>, john_sheehan@frontiercorp.com, "Wayne Hart" <whart@puc.state.id.us>, "Johnson, Bonnie J." <bjohnson@eschelon.com>, "Sherry. Lichtenberg (E-mail)" <sherry.lichtenberg@wcom.com>, "Lori Wright (E-mail)" <Lori.Wright@wcom.com>

WorldCom opposes Qwest "decision" language in the attached notification as it changes the intent of WCom's Exception change request. In addition, WCom not only agrees with Eschelon assessment of this situation but adds that this notification proves that Qwest believes it can unilaterally impose changes to CMP. As an initial matter, WCom provides the following comments (IN CAPS) surrounding section 16.4.1: 16.4.1Vote on Exception Request

A vote on whether an Exception Request will be handled on an exception basis will take place at the Emergency Call/Meeting, if one is held (See Section 6.2.1). If an Emergency Call/Meeting is not held, the vote will be taken at the Monthly CMP Meeting (See Section 16.4). The standards for determining whether a request should be handled on an exception basis are as follows: If the Exception Request is for a general change to the established CMP timelines without setting forth specific dates, a two-thirds majority vote will be required. THIS WOULD NOT BE THE PROCESS BECAUSE WCOM IS REQUESTING TO CHANGED EFINED DATES If the Exception Request is for changes to CMP timelines and sets forth specific dates for completion of tasks, a two-thirds majority vote will be required unless Qwest or a CLEC demonstrate, with substantiating information, that one of the criteria for denial set forth in Sections 5.1.3 or 5.3 is legitimately applicable. If one of the criteria for denial will cause such an exception request to be rejected, the requestor may withdraw the specific dates from its exception request at the meeting where it is discussed, in order to have the two thirds majority vote apply to the request

THIS WOULD BE THE PROCESS BECAUSE IF A 2/3 VOTE IS IN FAVOR OF WCOM'S PROPOSAL, QWEST WOULD BE REQUIRED TO IMPLEMENT THE TWO CRS BY YEAR END, WHICH WOULD ALSO CHANGE THE SPECIFIC TIME FRAMES SURROUNDING DOCUMENTATION REQUIREMENTS.

"Issue draft interface technical specifications 120 days in advance"

"Issue final interface technical specifications 100 days in advance"

WHILE THE DOCUMENTATION WOULD ONLY BE FOR TWO CRS AND NOT AN ENTIRE INTERFACE, CLECS WOULD NEED TECHNICAL SPECIFICATIONS IN ADVANCE OF THE CHANGES TO CODE ON OUR SIDE. THESE TIMELINES, AS WELL AS WALK THROUGH REQUIREMENTS WOULD HAVE TO BE ESTABLISHED. If the Exception Request seeks to alter any part of the this CMP other than the established timelines, unanimous agreement will be required.

THIS WOULD NOT BE THE PROCESS BECAUSE WCOM IS SEEKING TO ALTER TECHNICAL SPECIFICATION TIMELINES.

Regarding Qwest "decision" language that states "Qwest position is that this request seeks a change to the prescribed manner in which Qwest will apply systems resources, outlined in Sections 5.1.3, 5.2 and 5.2.1 of the Qwest Wholesale Change Management Process Document..."

WCom provides the following responses surrounding these sections: Section 5.1.3 Implementation of Regulatory CRs deals with Regulatory CRs for which CRs SCR060702-01 and SCR061302-01 have in no way been categorized by WCom as Regulatory CRs. Section 5.2 "CLEC-Qwest OSS Interface Change Request Lifecycle" states "Based on the Release candidate list/Initial Prioritization List, Qwest will begin its development cycle that includes the following milestones listed below":

The initial prioritization list has been available for Qwest to begin its development cycle since July 26, 2002. Change request SCR060702-01 "Migrate Customers using the Conversion as Specified Activity Type" was prioritized as # 2, thus Qwest should have begun its development cycle on this CR as of July 26th. In addition, per Qwest Ex Parte dated 8/13/02, this requested functionality existed prior to IMA release 6.0, therefore WCom questions the man hours Qwest has imposed for this CR (5675 - 9450 or Extra Large). Regarding CR SCR061302-01 "Migrate UNE-P Customers by TN", since CLECs don't yet have insight into Qwest's development cycle or whether packing options will be available for 12.0, it is too soon to tell whether this CRs has even been touched by Qwest development personnel. In addition, BellSouth implemented a "migrate by TN" CR in a total of 999 man hours. Thus, this also calls into question why Qwest has estimated double the man hours to implement (1875 -3125 or Medium). Section 5.2.1 "Business and Systems Requirements" states "Qwest engineers define the business and functional specifications during this phase. The specifications are completed on a per candidate basis in priority order. During business and system requirements, any candidates which have affinities and may be more efficiently implemented together will be discussed. Candidates with affinities are defined as candidates with similarities in functions or software components. Qwest will also present, at the Monthly CMP Systems Meeting, any complexities, changes in candidate size, or other concerns that may arise during business or system requirements, which would impact the implementation of the candidate."

This language only reiterates the processes as stated above, that Qwest has been directed by the CMP document to define the business and functional specifications in prioritization order. This process should have begun as of July 26th, 2002. WCom believes the following Qwest statement is highly exaggerated:

"Qwest cautions that, if granted, the accelerated nature of the development required to implement this request will impact CLECs and Qwest. This request requires Qwest to attempt to implement an additional Release, including CLEC coding changes, before December 31, 2002. Additionally, if

Information Current as of: Friday, September 27, 2002

CR # SCR082302-01EX

Report Name: rptOpenDetailed CR INDIVIDUAL REPORT SYSTEMS

Page 6 of 9

Open System Change Requests -- Detail

Qwest attempts to implement two CRs on a completely different timeframe than the rest of IMA 12.0. Qwest must divert resources already deployed to IMA 12.0. This resource diversion and intensified re-application will require a Level of Effort greater than that estimated prior to IMA 12.0. Prioritization (which assumed implementation with IMA 12.0 in April 2003), reducing the resources available for the remainder of IMA 12.0. "For starters, given that Qwest may be required to implement these two CRs by year end, WorldCom is extremely curious why Qwest would determine that a vote could wait until September 19, 2002. In addition, as stated above, the development cycle for "Migrate Customers using the Conversion as Specified Activity Type" should not only be well on its way but should be minimal given Qwest's assertion to the FCC that the functionality existed prior to IMA release 6.0. Then there's the "migrate by TN" CR. WCom would like addressed the question surrounding the man hours to implement, given that BellSouth implemented "migrate by TN" functionality in half the man hours. As well, CLECs have no insight into Qwest development cycle and/or "affinities" processes to know whether this CR has been touched by Qwest development personnel. That said, it is possible that development has occurred and/or affinities have been identified. On a final note, Qwest's Ex Parte dated 8/13/02 specifically states "The Exception Process, specified in Section 16 of the CMP, provides the ability for a CLEC or Qwest to request a deviation from the CMP. This process could be used to request expedited treatment or implementation outside of the normal planned release." WCom is attempting to utilize the Exception Process as Qwest defined it for the FCC. That the two CRs in question be implemented "outside of the normal planned release". Now that this request has been initiated, Qwest seeks to change the manner in which the process is defined.

Thanks, Liz Balvin WorldCom Carrier Management - Qwest Internal Line - V625-7305 External Line - 303-217-7305 Pager (888) 900-7221

Date: Aug30, 2002 Eff Date: Immediately CMPR.08.30.02.F.01322.Ad_Hoc_CMP_Mtg Notification Category: Change Management Notification
Target Audience: CLECs, Resellers Subject: CMP Request for Ad Hoc CMP Meeting Important Exception Discussion No Vote Required
This notice is to inform all CLECs that WorldCom has requested an additional CMP meeting before the next regularly scheduled monthly CMP meeting. On August 27, 2002, Qwest sent notice CMPR.08.27.02.F.01320.CMP_Meeting_Vote because of a CMP Exception

Request (SCR082302-01EX) submitted by WorldCom. WorldCom has subsequently requested an additional CMP meeting to discuss the exception as described below. Additional Meeting Details: Requestor: WorldCom Agenda: Begin verbatim excerpt of request received from WorldCom: WCom requests that an ad hoc meeting (per section 3) be established as soon as possible to address at a minimum the following issues: 1. More details provided by Qwest to better understand if this change request is approved, what would be the end result impact? What in addition to timeline changes (disclosure documentation requirements) does Qwest believe will apply? What is the progress to date surrounding these CRs... "migrate as specified" business development requirements should have begun as of July 26, 2002. Did Qwest account for the fact that migrate as specified functionality existed prior to IMA 6.0 when estimating its man hours? Has there been any analysis performed on "migrate by TN" (synergies?). Are the man hours established for "migrate by TN" still considered appropriate? How would Qwest resources be diverted How would the 12.0 prioritization list be impacted What additional man hours would be estimated 1. What "voting" standard must apply (2/3rds or unanimous)

Is it possible to treat the CRs separately given their 12.0 ranking status? Example: "migrate as specified" will be implemented in April/03, would only "timeline" changes apply?, thus 2/3rds vote 1. What other options are available to address the Exception CR and lessen the impact on the 12.0 release?

End verbatim excerpt of request received from WorldCom Supporting Documentation: Related Exception Request SCR082302-01EX (Exception Request to Implement Multiple CRs Prior to IMA 12.0) available in the CLEC Qwest Change Request Systems Interactive Reports at <http://www.qwest.com/wholesale/cmp/changerequest.html> Related Change Requests SCR060702-01 (Migrating Customers Using the Conversion As Specified Activity Type) and SCR061302-01 (Migrate UNE-P Customers By TN) available in the CLEC Qwest Change Request Systems Interactive Reports at

<http://www.qwest.com/wholesale/cmp/changerequest.html> Notice CMPR.08.27.02.F.01320.CMP_Meeting_Vote available in the Qwest Customer Notice Letters Archive (CNLA) at <http://www.qwest.com/wholesale/notices/cnla/> Logistics for Call/Meeting: Date: Monday, Sept 9, 2002 Time: 1:30 PM 3:00 PM MT Contact information: MI Buck, Qwest CMP Manager, mjbuck@qwest.com, 303-294-1633

Announcement September 4, 2002 Effective Date: Immediately CMPR.09.04.02.F.01323.Ad_Hoc_Mtg_Revision Notification Category: Change Management Notification Target Audience: CLECs, Resellers Subject: CMP Request for Ad Hoc CMP Meeting Important Exception Discussion No Vote Required MEETING DATE CHANGE This notice is to inform CLECs that Qwest has received a request to reschedule the Ad Hoc CMP Meeting described in notice CMPR.08.30.02.F.01322.Ad_Hoc_CMP_Mtg. As a result of this request, the logistics for the Ad Hoc meeting originally scheduled for September 9, 2002 have been revised as follows: Date: Wednesday, September 11, 2002 Time: 11:00 AM MT 12:30 PM MT Call in Details: 877-572-8687, The remainder of this notice contains meeting details as originally described in

notice CMPR.08.30.02.F.01322.Ad_Hoc_CMP_Mtg. This notice is to inform all CLECs that WorldCom has requested an additional CMP meeting before the next regularly scheduled monthly CMP meeting. On August 27, 2002, Qwest sent notice CMPR.08.27.02.F.01320.CMP_Meeting_Vote because of a CMP Exception Request (SCR082302-01EX) submitted by WorldCom. WorldCom has subsequently requested an additional CMP meeting to discuss the exception as described below. Additional Meeting Details: Requestor: WorldCom Agenda:

Begin verbatim excerpt of request received from WorldCom: WCom requests that an ad hoc meeting (per section 3) be established as soon as possible to address at a minimum the following issues: 1. More details provided by Qwest to better understand if this change request is approved, what would be the end result impact?

What in addition to timeline changes (disclosure documentation requirements) does Qwest believe will apply? What is the progress to date surrounding these CRs... "Migrate as specified" business development requirements should have begun as of July 26, 2002. Did Qwest account for the fact that migrate as specified functionality existed prior to IMA 6.0 when estimating its man hours? Has there been any analysis performed on "migrate by TN" (synergies?). Are the man hours established for "migrate by TN" still considered appropriate? How would Qwest resources be diverted How would the 12.0 prioritization list be impacted What additional man hours would be estimated 1. What "voting" standard must apply (2/3rds or unanimous) Is it possible to treat the CRs separately given their 12.0 ranking status? Example: "migrate as specified" will be implemented in April/03, would only "timeline" changes apply?, thus 2/3rds vote 1. What other options are available to address the Exception CR and lessen the impact on the 12.0 release? End verbatim excerpt of request received from WorldCom Supporting Documentation: Related Exception Request SCR082302-01EX (Exception Request to Implement Multiple CRs Prior to IMA 12.0) available in the CLEC Qwest Change Request Systems Interactive Reports at <http://www.qwest.com/wholesale/cmp/changerequest.html> Related Change Requests SCR060702-01 (Migrating Customers Using the Conversion As Specified Activity Type) and SCR061302-01 (Migrate UNE-P Customers By TN) available in the CLEC Qwest Change Request Systems Interactive Reports at <http://www.qwest.com/wholesale/cmp/changerequest.html> Notice CMPR.08.27.02.F.01320.CMP_Meeting_Vote available in the Qwest Customer Notice Letters Archive (CNLA) at <http://www.qwest.com/wholesale/notices/cnla/> Logistics for Call/Meeting: Date: Wednesday, September 11, 2002 Time: 11:00 AM MT 12:30 PM MT Conference Bridge Information: 877-572-8687, Passcode: 3393947# Primary Contact information: Michael Buck, Qwest CMP Manager,

Open System Change Requests -- Detail

mjbuck@qwest.com, 303-294-1633.

ANALYSIS AS REQUESTED BY WORLDCOM

WorldCom has requested that the schedule for two CRs that are currently prioritized in the IMA 12.0 Release Candidate List be accelerated, and that those two CRs be delivered before the end of 2002. The two CRs are: SCR060702-01 Migrating Customers using the Conversion As Specified Activity Type. This candidate was prioritized number two on the IMA 12.0 candidate list. SCR061302-01 Migrate UNE-P Customers by TN. This candidate was prioritized number nineteen on the IMA 12.0 candidate list. In response to WorldCom's request to accelerate these CRs, Qwest provides the following analysis as to the implications of fulfilling the request.

The first notable point is that both candidates are CLEC impacting candidates that by their implementation require that the functions associated with an IMA major release (technical specifications, CLEC interface testing, production migrations, etc.) be performed. Failing to perform these functions would render the candidates unusable by EDI CLECs. Having determined the need to treat these candidates as major release candidates, it should be noted that the IMA 11.0 Release lifecycle is currently in test and hence it is too late to attempt to implement these candidates as part of the 11.0 release. With the schedule for IMA 11.0 release in November, it is not possible to complete the development effort for these two candidates and deliver them in December. The best possible schedule Qwest could achieve for the delivery of these two candidates is to convert the 11.1 point release scheduled for January 2003 to a special major release, include these candidates along with the current 11.1 candidates and deliver them in January 2003. Following this schedule will require the delivery of a SATE special release and the IMA special major release simultaneously, violating the SATE 30-day test window required by CMP and likely impacting the schedule on which PO-19 could be executed. Alternatively, if the SATE 30-day test window is a requirement, the SATE special release could be delivered in January 2003 with the IMA special major release delivered in February 2003. Since this would only result in a schedule acceleration of 60 days, we will assume that WorldCom would prefer to see the candidates delivered in January 2003 and will use that date in further discussions. Much of the discussion does not change regardless of whether the date is January 2003 or February 2003.

Approval of this exception CR will create a major IMA release with only one quarter's notice prior to implementation. Because of this aggressive schedule, EDI CLECs will have to work similarly aggressive development schedules on their side of the EDI interface in order to take advantage of these candidates prior to the IMA 12.0 release. Acceleration of candidates of this nature has implications that arise simply from the requirements of the development process itself. The first of these is the risk associated with the delivery of the release. By accelerating these candidates, you drastically reduce the development lifecycle timeline and thereby increase the likelihood of an issue arising from which the IMA timeline cannot recover, and potentially causing Qwest to fail to deliver the release on the accelerated schedule. The risk associated with the development schedule pertains not only to the software itself, but also to the accompanying deliverables such as documentation. Working under this accelerated schedule, Qwest will not be able to make the CMP required technical specifications delivery schedule (section 8.1 of the CMP document) or the documentation schedule. While a detailed schedule for these deliverables has not been completed, a high level assessment of the situation would indicate that Qwest would miss these dates by at least 30 days in some cases (draft interface technical specifications). The same implications exist for the training schedule. The addition of these products will require revision of the training classes very close behind the revisions required for IMA 11.0. This will cause overlap in the both the training development and delivery schedule that will have to be managed. The second development issue pertains to the shifting of resources from the IMA 12.0 Release to this special major release. Creating this special major release will require the resources currently devoted to IMA 11.1 as well as the diversion of IMA 12.0 resources to this special major release. Because of the additional resources required on an accelerated development schedule, using the high end range of the LOEs for these candidates, Qwest would need to divert approximately 13,000 hours of effort from the IMA 12.0 to apply to this special major release. This would result in the application of 27,000 hours to the IMA 12.0 Release. Based on the application of 40,000 hours to the IMA 12.0 candidate list, Qwest is most likely to be able to complete the top 19 candidates. With the application of 27,000 hours to the IMA 12.0 Release, Qwest is most likely to be able to complete 16 candidates resulting in not only moving these two candidates out of the release, but also losing one additional candidate. While there have not been any packaging or commitment decisions made for IMA 12.0, it is likely that either SCR062702-03

Autopopulate LSO (Local Serving Office) field in IMA and remove edit that prevents APTCON (appointment confirmation) and LSO field to both be populated or SCR062702-10 Create a field in IMA that can be checked to flag this LSR is to place a change order on an account where the CSR is not updated from the conversion activity would need to be dropped from the release. Additionally, there are several CMP issues that are created by using the above schedule for the special major release. The first is the requirement that The Major release changes should occur no less than three (3) months apart as specified in section 8.0, Changes to Existing OSS Interfaces, of the CMP document. Whether the release is delivered in January or February of 2003, this CMP requirement will be violated with the IMA 11.0 and 12.0 dates remaining where they are at today. Having major releases this close together will impact the sunset dates for the major releases under discussion. Section 8.0 of the CMP document specifies that Qwest will support the previous major Interconnect Mediated Access (IMA) EDI release for six (6) months after the subsequent major IMA EDI release has been implemented. Qwest supports 3 production hardware platforms, which, when releases are at least 3 months apart, is sufficient to meet the requirements of CMP. However, under the schedule discussed above, using these three hardware platforms would require the early retirement of both the IMA 10.0 and 11.0 releases. IMA 10.0 will be retired in April 2003 instead of May 2003. Qwest has already received inquiries about extending the sunset date for IMA 10.0 beyond May. These inquiries would have to be denied with the approval of this exception CR. Additionally, the IMA 11.0 retirement date would be moved from October 2003 to July 2003. Another CMP concern involves the requirement to prioritize what candidates will be scheduled for a major release of IMA (section 10 of the CMP document). As described above, the delivery of these candidates requires the implementation of a major release. Invoking this exception process to move the number 2 and 19 candidates from the IMA 12.0 prioritization list into a major release of their own without providing the opportunity required under CMP to prioritize the contents of the new release. Approval of this exception will overrule the outcome of the previous WorldCom exception, which was unanimously approved by the CLECs and Qwest. It should be noted that CMP Redesign Team developed a specific process (SCRP) for the situation in which a candidate or candidates is not prioritized high enough to be slotted into a release that would meet a CLECs desired timeframe. An alternative mechanism for requesting the acceleration of these candidates may be the SCR process which would involve the application of additional, CLEC funded, resources and would not be as disruptive to the development efforts currently underway. Finally, one additional question has come up that was not answered as part of the above analysis and are included here for completeness. Question: What is the progress to date surrounding these CRs migrate as specified business development requirements should have begun as of July 26, 2002. Did Qwest account for the fact that migrate as specified functionality existed prior to IMA 6.0 when estimating its man-hours? Has there been any analysis performed on migrate by TN (synergies?). Are the man-hours established for migrate by TN still considered appropriate? Response: The CR Migrating Customers using the Conversion As Specified Activity Type is in the Business Requirements phase and is scheduled to complete this phase by mid September. The functionality existing prior to the IMA 6.0 release helps only in understanding some of the complexities of this deliverable. The system changes in each release and the requirements have to be written to support or build upon the current release level. The staff-hours are still valid at the point. The re-evaluation of the LOEs will be done just prior to packaging and any changes in the LOEs will be made available to CMP. The CRMigrate UNE-P Customers by TN is just beginning its definition phase. Qwest defines the CRs based on their CMP prioritized ranking. As with all CRs we

Information Current as of: Friday, September 27, 2002

Report Name: rptOpenDetailed CR INDIVIDUAL REPORT SYSTEMS

CR # SCR082302-01EX

Page 8 of 9

Open System Change Requests -- Detail

look for synergies during the definition phase. A full synergy evaluation would be complete by end of September when the CR is targeted to complete the Business Requirements phase. The staff-hours are still valid at this point. As with the previous CR, the reevaluation of the LOEs will be done just prior to packaging any changes in LOEs will be made available to CMP.

=====
Date: Sept 10, 2002 Eff Date: Immediately: CMPR.09.10.02.F.01324.Ad_Hoc_Mtg

QWEST - INTERNAL NOTIFICATION

Announcement Date:

September 24, 2002

Effective Date:

Immediately

Notification Number:

I.CMPR.09.24.02.F.01328.CMP_ExceptionCR_Vote

Notification Category:

Change Management Notification

Target Audience:

CLECs, Resellers

Subject:

CMP – Emergency Call/Meeting Vote Disposition

Associated CR # or System Name and Number:

SCR082302-01EX

TO:

**Sales Teams, Service Managers, Product Managers,
Process Managers and other organizations with a need
to know**

This notice regarding the voting results of SCR082302-01EX will be released to wholesale customers on September 24, 2002.

Pursuant to Sections 16.5 and 17.4.4 of the Qwest Wholesale Change Management Process Document, <http://www.qwest.com/wholesale/cmp/whatiscmp.html>, this notification announces the disposition of Exception Change Request SCR082302-01EX and the results of the vote taken during the September 19, 2002, Exception Request Meeting.

In this vote, conducted in accordance with Sections 16.4 and 17.0, the participants voted not to treat SCR082302-01EX as an Exception by a vote of 6 "No" votes, 6 "Yes" votes, and 3 "Abstain" votes. Please see the attached tally form and meeting minutes for specific voting results.

Sincerely,

Qwest

Note: In cases of conflict between the changes implemented through this notification and any CLEC Interconnection Agreement (whether based on the Qwest SGAT or not), the rates, terms and conditions of such Interconnection Agreement shall prevail as between Qwest and the CLEC party to such Interconnection Agreement.

The Qwest Wholesale Web Site provides a comprehensive catalog of detailed information on Qwest products and services including specific descriptions on doing business with Qwest. All information provided on the site describes current activities and process. Prior to any modifications to existing activities or processes described on the web site, wholesale customers will receive written notification announcing the upcoming change.